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August 31, 1988

RE: Henderson Road NPL Site

Ms. Gerallyn Downes-Valls  
U.S. Environmental Protection Agency, Region 3  
PA CERCLA Remedial Enforcement Section (3HW12)  
841 Chestnut Street, 6th Floor  
Philadelphia, Pa. 19107

HAND-DELIVERED

Dear Ms. Downes-Valls:

Unfortunately, I have not been able to get in touch with you to discuss questions which I had pertaining to EPA's Request for Information letter addressed to The Budd Company pertaining to the above-referenced site. However, we have responded based on our reading of the Request.

I spoke yesterday with Wayne Walters, who provided me with a further extension until September 1, 1988 within which to respond to the Request for Information. Mr. Walters suggested that I put in writing to you the following: First, kindly advise as to the precise dates the Henderson Road NPL Site was receiving wastes. Second, as the enclosed letter reflects, we are making available to EPA for inspection at my office portions of litigation files which are arguably responsive to the inquiry, but which are voluminous in nature. Because the documents are voluminous (several file drawers), and I am the person who knows best how to locate certain categories of documents, I would suggest that this review occur when I return from vacation (I leave tomorrow) because I can more easily direct you to the pertinent documents and answer questions which you may have. If this is not acceptable, you may contact my secretary in my absence who can at least attempt to make available to you our

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discovery files, including the deposition transcripts, responses to written discovery requests and pleadings and motions.

Very truly yours,

KELLY, HARRINGTON, McLAUGHLIN & FOSTER

BY:

JENNIFER BERKE

JB/jt

Enclosure

cc: Wayne Walters, Esquire (EPA)  
(w/o enclosure)

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